

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LEONITUS JABIR BEY,
Plaintiff,

C.A. NO.: 19-10219- PBS

v.

DAVID PENDER,
Defendant

DEFENDANT'S OPPOSITION/ RESPONSE TO THE PRO SE PLAINTIFF'S MOTION FOR
EXTENSION FOR A DEPOSITION.

The pro se plaintiff mistakenly seeks an extension for 28 days to "... respond to the defendant's deposition." He is looking to take the defendant's deposition, not to appear for a deposition noticed by the defendant. The pro se plaintiff has already been deposed by the defendant.

The undersigned and his assistant have spoken and emailed the pro se plaintiff and indicated that he needed to properly notice a deposition and also to hire a court reporter in order to conduct a deposition. Upon information and belief, the pro se plaintiff was not aware of that process.

The defendant requests that any order include that the pro se plaintiff must notice a deposition and retain a court reporter prior to scheduling a deposition.

Additionally, the undersigned is counsel for the defendant Gavin in the case entitled Payne-Callender v. Gavin and City of Boston, 19-cv-11286 RGS. in which he is scheduled to appear at twelve depositions in July and August as the court has ordered discovery to be completed before September 1, and six others currently scheduled in other cases along with contract negotiations and court hearings, as well as vacation and vacation for the defendant.

Wherefore, the defendant requests that the time for the deposition be extended into September.

The Defendant,

By his attorney,

/s/Bradford N. Louison

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Louison, Costello, Condon & Pfaff, LLP
101 Summer Street
Boston, MA 02110
(617) 439-0305

Date: June 30, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing to be served by email to:

Leonitus Jibir Bey
Rah Leonidas Yamexum Bey
ryamexum@gmail.com
P.O. Box 1934
Lowell, Mass 01854

/s/ Bradford N. Louison

Bradford N. Louison